


IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

OCT - 8 2014

JAMES W. MCCORMACK, CLERK
By:  DEP. CLERK

CHAROLDA WALTON,)
a/k/a "ROE";)
FELICIA HOLMES;)
TIMMY LARVALE MCCAIN;)
WILLIE JAMES JOHNSON;)
BRIAN HOLLAND;)
MARK COUCH;)
STEPHEN CUFFMAN;)
WARREN HART;)
KILA BROWN;)
ALLEN BRAGG;)
DAVID SAWYER;)
TASHARA JONES;)
AUSTIN SNYDER;)
BRANDON RILEY;)
KIEFER COLLINS;)
GABRIEL ELLINGTON;)
PATRICIA BELL;)
MICHAEL SUMMERS;)
SHANNON EDENS;)
STEPHANIE WALKER;)
CHANDRIA STIGALL;)
SUZETTE ELLIS;)
CEDRIC COBBS;)
CHARLES ELIE;)
BARRON FOSTER;)
DUSTIN TARRANTS;)
LAYTH QASSAS;)
HENRY JACKSON;)
MICHAEL CARRIER;)
WILLIAM MCARTHUR;)
MICHAEL WILLIAMS;)
BROOKE SMITH;)
GEORRAIL WILLIAMS;)

FILED UNDER SEAL

Case No. 4:14-CR-00211 DPM

18 U.S.C. § 2
21 U.S.C. § 841(a)(1), (b)(1)(C)
21 U.S.C. § 843(b)
21 U.S.C. § 846
21 U.S.C. § 853(d)
18 U.S.C. § 924(d)
28 U.S.C. § 2561(c)
18 U.S.C. § 3013
18 U.S.C. § 3571
18 U.S.C. § 3583

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

Beginning in or about June 2013, and continuing through on or about October 7, 2014, in the Eastern District of Arkansas, and elsewhere,

**CHARLODA WALTON, a/k/a “ROE”,
FELICIA HOLMES,
TIMMY LARVALE MCCAIN,
WILLIE JAMES JOHNSON,
BRIAN HOLLAND,
MARK COUCH,
STEPHEN CUFFMAN,
WARREN HART,
KILA BROWN,
ALLEN BRAGG,
DAVID SAWYER,
TASHARA JONES,
AUSTIN SNYDER,
BRANDON RILEY,
KIEFER COLLINS,
GABRIEL ELLINGTON,
PATRICIA BELL,
MICHAEL SUMMERS,
SHANNON EDENS,
STEPHANIE WALKER,
CHANDRIA STIGALL,
SUZETTE ELLIS,
CEDRIC COBBS,
CHARLES ELIE,
BARRON FOSTER,
DUSTIN TARRANTS,
LAYTH QASSAS,
HENRY JACKSON,
MICHAEL CARRIER,
WILLIAM MCARTHUR,
MICHAEL WILLIAMS,
BROOKE SMITH, and
GEORRAIL WILLIAMS,**

defendants herein, conspired and agreed with each other, and with others known and unknown to the grand jury, to knowingly and intentionally distribute and to possess with intent to distribute Oxycodone, a Schedule II controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

On or about October 23, 2013, in the Eastern District of Arkansas, the defendant,

WILLIE JAMES JOHNSON,

did knowingly and intentionally distribute Oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE

On or about November 5, 2013, in the Eastern District of Arkansas, the defendant,

WILLIE JAMES JOHNSON,

did knowingly and intentionally distribute Oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOUR

On or about October 30, 2013, in the Eastern District of Arkansas, the defendant,

BRIAN HOLLAND,

did knowingly and intentionally distribute Oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIVE

On or about December 10, 2013, in the Eastern District of Arkansas, the defendant,

BRIAN HOLLAND,

did knowingly and intentionally distribute Oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIX

On or about November 20, 2013, in the Eastern District of Arkansas, the defendants,

BRIAN HOLLAND and TIMMY LARVALE MCCAIN,

aiding and abetting one another, did knowingly and intentionally distribute Oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SEVEN

On or about November 20, 2013, in the Eastern District of Arkansas, the defendant,

TIMMY LARVALE MCCAIN,

did knowingly and intentionally possess with the intent to distribute Oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHT

On or about November 20, 2013, in the Eastern District of Arkansas, the defendant,

TIMMY LARVALE MCCAIN,

did knowingly and intentionally possess with the intent to distribute Hydromorphone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT NINE

On or about November 20, 2013, in the Eastern District of Arkansas, the defendant,

TIMMY LARVALE MCCAIN,

in furtherance of a drug trafficking crime for which he can be prosecuted in a court of the United States, to wit, conspiracy to possess with intent to distribute and distribution of Oxycodone, distribution of Oxycodone, possession with intent to distribute Oxycodone, and possession with intent to distribute Hydromorphone, as charged in Counts One, Six, Seven, and Eight of this Indictment, knowingly possessed the following firearm, to wit, one Smith & Wesson, .40 caliber handgun, model SD40, bearing serial number HEC3290, thereby violating Title 18, United States Code, Section 924(c)(1)(A).

COUNT TEN

On or about December 20, 2013, in the Eastern District of Arkansas, the defendant,

CHAROLDA WALTON, a/k/a “ROE”,

did knowingly and intentionally distribute Oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT ELEVEN

On or about December 31, 2013, in the Eastern District of Arkansas, the defendant,

CHAROLDA WALTON, a/k/a “ROE”,

did knowingly and intentionally distribute Oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWELVE

On or about January 9, 2014, in the Eastern District of Arkansas, the defendant,

CHAROLDA WALTON, a/k/a “ROE”,

did knowingly and intentionally distribute Oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTEEN

On or about January 3, 2014, in the Eastern District of Arkansas, the defendants,

MICHAEL SUMMERS and SHANNON EDENS,

aiding and abetting one another, did knowingly and intentionally distribute Oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FOURTEEN

On or about January 13, 2014, in the Eastern District of Arkansas, the defendants,

MICHAEL SUMMERS and SHANNON EDENS,

aiding and abetting one another, did knowingly and intentionally distribute Morphine, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIFTEEN

On or about January 29, 2014, in the Eastern District of Arkansas, the defendant,

CHAROLDA WALTON, a/k/a “ROE”,

did knowingly and intentionally distribute Oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIXTEEN

On or about February 18, 2014, in the Eastern District of Arkansas, the defendant,

TIMMY LARVALE MCCAIN,

did knowingly and intentionally distribute Oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SEVENTEEN

On or about February 21, 2014, in the Eastern District of Arkansas, the defendant,

TIMMY LARVALE MCCAIN,

did knowingly and intentionally distribute Oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHTEEN

On or about February 24, 2014, in the Eastern District of Arkansas, the Defendants,

CHAROLDA WALTON, a/k/a “ROE”, and FELICIA HOLMES,

aiding and abetting one another, did knowingly and intentionally distribute Oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT NINETEEN

On or about March 13, 2014, in the Eastern District of Arkansas, the defendant,

KILA BROWN,

did knowingly and intentionally distribute Oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY

On or about March 17, 2014, in the Eastern District of Arkansas, the defendant,

KILA BROWN,

did knowingly and intentionally distribute Oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-ONE

On or about March 25, 2014, in the Eastern District of Arkansas, the defendant,

ALLEN BRAGG,

did knowingly and intentionally distribute Oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-TWO

On or about April 10, 2014, in the Eastern District of Arkansas, the defendant,

ALLEN BRAGG,

did knowingly and intentionally distribute Oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-THREE

On or about April 21, 2014, in the Eastern District of Arkansas, the defendant,

MICHAEL WILLIAMS,

did knowingly and intentionally possess with the intent to distribute Oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-FOUR

On or about April 21, 2014, in the Eastern District of Arkansas, the defendant,

BROOKE SMITH,

did knowingly and intentionally possess with the intent to distribute Oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-FIVE

On or about January 29, 2014, in the Eastern District of Arkansas, the defendant,

CHAROLDA WALTON, a/k/a “ROE”,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-SIX

On or about March 10, 2014, in the Eastern District of Arkansas, the defendant,

CHAROLDA WALTON, a/k/a “ROE”,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-SEVEN

On or about April 20, 2014, in the Eastern District of Arkansas, the defendant,

FELICIA HOLMES,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-EIGHT

On or about April 24, 2014, in the Eastern District of Arkansas, the defendant,

FELICIA HOLMES,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-NINE

On or about November 5, 2013, in the Eastern District of Arkansas, the defendant,

WILLIE JAMES JOHNSON,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to

distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY

On or about March 10, 2014, in the Eastern District of Arkansas, the defendant,

WILLIE JAMES JOHNSON,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY-ONE

On or about March 10, 2014, in the Eastern District of Arkansas, the defendant,

BRIAN HOLLAND,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY-TWO

On or about March 11, 2014, in the Eastern District of Arkansas, the defendant,

BRIAN HOLLAND,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY-THREE

On or about March 17, 2014, in the Eastern District of Arkansas, the defendant,

BRIAN HOLLAND,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY-FOUR

On or about March 16, 2014, in the Eastern District of Arkansas, the defendant,

MARK COUCH,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY-FIVE

On or about April 2, 2014, in the Eastern District of Arkansas, the defendant,

MARK COUCH,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY-SIX

On or about March 12, 2014, in the Eastern District of Arkansas, the defendant,

STEPHEN CUFFMAN,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY-SEVEN

On or about March 13, 2014, in the Eastern District of Arkansas, the defendant,

STEPHEN CUFFMAN,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to

distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY-EIGHT

On or about April 17, 2014, in the Eastern District of Arkansas, the defendant,

WARREN HART,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY-NINE

On or about April 23, 2014, in the Eastern District of Arkansas, the defendant,

WARREN HART,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT FORTY

On or about March 13, 2014, in the Eastern District of Arkansas, the defendant,

KILA BROWN,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT FORTY-ONE

On or about March 17, 2014, in the Eastern District of Arkansas, the defendant,

KILA BROWN,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT FORTY-TWO

On or about March 25, 2014, in the Eastern District of Arkansas, the defendant,

ALLEN BRAGG,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT FORTY-THREE

On or about March 29, 2014, in the Eastern District of Arkansas, the defendant,

DAVID SAWYER,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT FORTY-FOUR

On or about April 2, 2014, in the Eastern District of Arkansas, the defendant,

DAVID SAWYER,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT FORTY-FIVE

On or about March 16, 2014, in the Eastern District of Arkansas, the defendant,

TASHARA JONES,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to

distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT FORTY-SIX

On or about March 18, 2014, in the Eastern District of Arkansas, the defendant,

TASHARA JONES,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT FORTY-SEVEN

On or about April 3, 2014, in the Eastern District of Arkansas, the defendant,

AUSTIN SNYDER,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT FORTY-EIGHT

On or about April 4, 2014, in the Eastern District of Arkansas, the defendant,

AUSTIN SNYDER,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT FORTY-NINE

On or about March 15, 2014, in the Eastern District of Arkansas, the defendant,

BRANDON RILEY,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT FIFTY

On or about March 16, 2014, in the Eastern District of Arkansas, the defendant,

BRANDON RILEY,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT FIFTY-ONE

On or about April 3, 2014, in the Eastern District of Arkansas, the defendant,

KIEFER COLLINS,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT FIFTY-TWO

On or about April 4, 2014, in the Eastern District of Arkansas, the defendant,

KIEFER COLLINS,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT FIFTY-THREE

On or about March 20, 2014, in the Eastern District of Arkansas, the defendant,

GABRIEL ELLINGTON,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to

distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT FIFTY-FOUR

On or about March 27, 2014, in the Eastern District of Arkansas, the defendant,

GABRIEL ELLINGTON,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT FIFTY-FIVE

On or about April 20, 2014, in the Eastern District of Arkansas, the defendant,

PATRICIA BELL,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT FIFTY-SIX

On or about April 21, 2014, in the Eastern District of Arkansas, the defendant,

PATRICIA BELL,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT FIFTY-SEVEN

On or about January 13, 2014, in the Eastern District of Arkansas, the defendant,

MICHAEL SUMMERS,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT FIFTY-EIGHT

On or about March 20, 2014, in the Eastern District of Arkansas, the defendant,

MICHAEL SUMMERS,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT FIFTY-NINE

On or about April 17, 2014, in the Eastern District of Arkansas, the defendant,

STEPHANIE WALKER,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT SIXTY

On or about March 25, 2014, in the Eastern District of Arkansas, the defendant,

CHANDRIA STIGALL,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT SIXTY-ONE

On or about April 2, 2014, in the Eastern District of Arkansas, the defendant,

CHANDRIA STIGALL,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to

distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT SIXTY-TWO

On or about March 18, 2014, in the Eastern District of Arkansas, the defendant,

SUZETTE ELLIS,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT SIXTY-THREE

On or about March 21, 2014, in the Eastern District of Arkansas, the defendant,

SUZETTE ELLIS,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT SIXTY-FOUR

On or about March 15, 2014, in the Eastern District of Arkansas, the defendant,

CEDRIC COBBS,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT SIXTY-FIVE

On or about March 16, 2014, in the Eastern District of Arkansas, the defendant,

CEDRIC COBBS,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT SIXTY-SIX

On or about March 11, 2014, in the Eastern District of Arkansas, the defendant,

CHARLES ELIE,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT SIXTY-SEVEN

On or about March 21, 2014, in the Eastern District of Arkansas, the defendant,

CHARLES ELIE,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT SIXTY-EIGHT

On or about April 3, 2014, in the Eastern District of Arkansas, the defendant,

BARRON FOSTER,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT SIXTY-NINE

On or about April 4, 2014, in the Eastern District of Arkansas, the defendant,

BARRON FOSTER,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to

distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT SEVENTY

On or about March 13, 2014, in the Eastern District of Arkansas, the defendant,

DUSTIN TARRANTS,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT SEVENTY-ONE

On or about March 21, 2014, in the Eastern District of Arkansas, the defendant,

DUSTIN TARRANTS,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT SEVENTY-TWO

On or about April 6, 2014, in the Eastern District of Arkansas, the defendant,

LAYTH QASSAS,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT SEVENTY-THREE

On or about March 14, 2014, in the Eastern District of Arkansas, the defendant,

HENRY JACKSON,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT SEVENTY-FOUR

On or about April 1, 2014, in the Eastern District of Arkansas, the defendant,

HENRY JACKSON,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT SEVENTY-FIVE

On or about March 25, 2014, in the Eastern District of Arkansas, the defendant,

MICHAEL CARRIER,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT SEVENTY-SIX

On or about March 27, 2014, in the Eastern District of Arkansas, the defendant,

MICHAEL CARRIER,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT SEVENTY-SEVEN

On or about March 17, 2014, in the Eastern District of Arkansas, the defendant,

WILLIAM McARTHUR,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to

distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

COUNT SEVENTY-EIGHT

On or about March 21, 2014, in the Eastern District of Arkansas, the defendant,

WILLIAM McARTHUR,

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count One of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

FORFEITURE ALLEGATION ONE

Upon conviction of one or more of the offenses charged in Counts 1, 6, 7, or 8, the defendant,

TIMMY LARVALE MCCAIN,

shall forfeit to the United States, under 21 U.S.C. § 853, all property constituting, or derived from, any proceeds the defendant obtained, directly, or indirectly, as a result of the offense, including but not limited to the following:

1.) \$21,022 in U.S. currency.

FORFEITURE ALLEGATION TWO

Upon conviction of one or more of the offenses charged in Counts 1, 6, 7, or 8, the defendant,

TIMMY LARVALE MCCAIN,

shall forfeit to the United States, under 21 U.S.C. § 853, all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense, including but not limited to the following:

- 1.) \$21,022 in U.S. currency; and
- 2.) One Smith & Wesson, .40 caliber handgun, model SD40, bearing serial number HEC3290.

FORFEITURE ALLEGATION THREE

Upon conviction of the offense alleged in Count 9, the Defendant,

TIMMY LARVALE MCCAIN,

shall forfeit to the United States, under Title 18, United States Code, Section 924(d), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved or used in the commission of the offense, including, but not limited to:

- 1.) One Smith & Wesson, .40 caliber handgun, model SD40, bearing serial number HEC3290.

[End of text. Signature page to follow.]